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Subject: R8 Meeting with Uinta Basin Operators on Emission Inventory Comparative Analyses

Wanted to give you all a heads up that Region 8, UDAQ and the Ute Tribe are meeting with Operators who had submitted UDAQ/EPA workbooks for a 2014 UB O&G Emission Inventory (UBEI). Via the UT Governor and the Ute tribal Chairman, industry has communicated to the EPA that they want us to use this UBEI, instead of the Tribal Minor Source Registration data, for the Uintah & Ouray reservation-specific FIP – rulemaking currently in OMB to reduce VOC emissions from existing sources.

The EPA R8 Air Program will be meeting with UDAQ, Ute Tribe and Operators on 12/12/16 via webinar to share our analysis of the recently completed Uinta Basin Emission Inventory (UBEI). We will show results of our detailed comparative analysis between: (1) Indian country vs. State in the UBEI, (2) UBEI-Indian country vs. the UB Tribal Minor Source Registration data, (3) UBEI (State and Indian country) vs. Greenhouse Gas Reporting Program subpart W. All three emissions data sets were submitted by Operators.

Research in UB indicated a discrepancy between top-down measurements and bottom-up emission inventories. The UBEI indicates lower VOC emissions than used previously which widens that discrepancy. Our purpose in meeting with the Operators is to be transparent in our analysis so that together we can arrive at a solid and sound emission inventory which will become our new benchmark in the Basin. We will contact the Operators individually after the webinar to ask specific questions to address anomalies identified in our analyses.

We dig into many details of all three data sets, but a high-level comparison looks like this:

Why do comparative analyses of emissions

2014 UB Emission Inventory:

- VOC emissions down
 - ↓ ~40% vs. WRAP-Phase III upon which ozone modeling built upon
- Discrepancies with Tribal Existing Minor Source Registrations, e.g.
 - ↑ 30% number of sources
 - ↓ 76% glycol dehydrator VOC emissions
 - ↓ 66% tank VOC emissions
- Discrepancies with Greenhouse Gas Reporting Rule subpart W, e.g.
 - ↓ 27% number pneumatic pumps (> 3,000)
 - ↑ 22% number pneumatic controllers (>8,000)
- Detailed comparative analysis underway to work with operators to ensure solid, sound Uinta Basin Emission Inventory

If you've any questions, please ask!

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